

Here is the citation material you requested:

Record Item: Trial Testimony of M. Brewster Smith or Kenneth B. Clark

File Unit: Case File 1333, Volume 2, pgs. 261-300, 377-406  
Case File 1333, Volume 3, pgs. 408-458

Series: Civil Case Files, 1938-1958

Subgroup: Richmond Division

Record Group: Records of the U.S. District Court for the Eastern District of Virginia, Record Group 21

Repository: National Archives-Mid Atlantic Region, Philadelphia, PA.

MR. CARTER: I would like to call as our next witness Dr. Clark.

-----

KENNETH CLARK, called as a witness by and on behalf of the plaintiffs, being first duly sworn, testified as follows:

BY MR. CARTER:

Q Dr. Clark, what is your present occupation?

A I am Assistant Professor of Psychology at the College of the City of New York.

JUDGE DOBIE: What is your name, please?

THE WITNESS: Kenneth Clark.

A (continued) I am the Associate Director of the Northside Center for Child Development in New York City.

Q I think there is no problem about the City College, but would you tell us what the Northside Center is?

A The Northside Center is the child guidance center. We have a staff of psychiatrists, psychologists, social workers who work with children who have emotional problems



Clark - Direct

or behavior problems which interfere with their adjustment in school, in home, or in the community, and we try to help these children get over their problems so that they can become useful and productive members of society.

Q How long have you been connected with the City College?

A I have been connected with the College of the City of New York, Psychology Department, since 1940, but not continuously since 1940. I have been connected with the college continuously since 1942.

Q How long have you operated the Northside Center for Child Guidance?

A Since 1945.

Q Will you tell us what your educational background is, Dr. Clark?

A Yes. I attended elementary and secondary schools in New York City, A.B. and M.S. from Howard University in Washington, D. C., and Ph.D. from the Department of Psychology, New York University, in 1940.

Q Prior to your present two occupations, would you indicate to us what other experiences you have had?

A Right after my Masters at Howard, I taught psychology there for a year, and then went into Columbia to get my Ph.D. While working on my Ph.D. at Columbia, I



Clark - Direct

was the Research Psychologist for the American Youth Commission that was, at that time, doing a study on the facts of minority status on the personality of Negro youth. Also, while I was at Columbia, I was on the staff of the Carnegie Corporation study of Negro in America, which was directed by Gunnar Myrdal, who was a research psychologist up there gathering and interpreting material which has to do with racial attitudes and personality as it is affected by racial attitudes.

After working with Myrdal studies and completing my work, I came down to Hampton Institute and I taught there for six months.

Q In Virginia?

A In Virginia. I was assistant professor of psychology in Hampton until I went with the Government. In fact, I left Hampton because I went with the Government in the Office of War Information, where I had the responsibility of gathering information and interpreting information having to do with the problem of the morale of the Negro in America during the period of war. This required my traveling throughout the country making studies for the Government. After the O.W.I. experience, I went to the College of the City of New York and, in addition to teaching, I was Research Associate for the American Jewish



A-4

Clark - Direct

Congress, where I had the responsibility of training interviewers to make community surveys of attitudes, and also directing one of their studies and interpreting the material for them, and I worked with the American Jewish Committee as a consultant on some of their research problems.

Most recently, I was charged with the responsibility of gathering for the Mid-Century White House Conference on Children and Youth all of the published material dealing with the effects of prejudice, discrimination and segregation on the personality of children, the children who are the victims of the segregation and prejudice, and those who are allegedly the beneficiaries of prejudice and segregation.

This was done, I think, during 1950, for a year before the Mid-Century Conference. I was a member of the fact finding staff, charged with the specific responsibility of preparing a manuscript which would be used at the Conference in those areas of the conferences deliberation that dealt with this problem.



Kenneth Clark - Direct

Q Have you published any texts or articles in the field of psychology?

A Yes, I have. I have published about 30 articles dealing with different phases of psychology, but particularly in the area of personality and the effects of social situations upon personality and race. I have contributed to chapters in, I think, three books. One of the most recent articles was an article that was published in the International Bulletin of Social Science, dealing with racial prejudices among American minorities, and another more recent article was an article published in Child Study Magazine on how to break our children from prejudice.

Q Now, would you name some of the important professional societies to which you belong?

A The American Psychological Association; the Division of Personality and Social Psychology -- I am a fellow of that division; also, the Society for the Psychological study of social issues; and I am a member of the scientific and honorary society, Sigma Psi.

Q Doctor Clark, are there any methods which are scientifically accurate with which a psychiatrist can test a child and determine whether or not an isolated fact like racial segregation has any effect upon his personality growth or development?



## Kenneth Clark - Direct

A Yes, there are a number of methods by which a psychologist might test.

Q Would you mind telling us briefly what the methods are?

A There is an interview method in which one seeks to understand how a personality reacts to different situations by questions. These questions may be rather highly structured, or formal questions, or they may be informal or unstructured questions. There is the questionnaire method, where you have a prepared list of questions. These questions are the same questions that are given to everyone whom you are interested in. A more precise kind of questionnaire method is the test method. There are certain pencil-and-paper personality tests which have some use in this field.

I think the most promising methods, which are being more and more used for this, are what are called projective methods. These are methods which have the advantage of eliciting certain responses from your subject which ordinarily you would not get in those cases in which you are dealing with the kinds of problems, or the kinds of ideas, or the kinds of attitudes which the individual might not want to deal with directly. He might not want to consciously and clearly express in an interview, or in a situation in which it is clearly understood what the psychologist is after. A good example



Kenneth Clark - Direct

of this projective method would be an ink blot, which is where a person is shown an ink blot and the psychologist asks him what he sees. This seems to him pretty silly, but in his attempt to structure, in his attempt to make something out of an ink blot, the psychologist assumes that he is really giving a part of himself he is telling you something that he feels, because it is really not in the ink blot.

Another example would be photographs, pictures of a situation where you ask the person to tell you about this situation, tell you what he sees, what is happening in the picture. This has been pretty widely used among psychologists on the assumption that what each individual is telling you is in some way -- in some complex way he is telling you something about himself, and in the hands of a trained examiner, in the hands of a person skillful in interpreting the meaning of these results, you can get the kinds of pictures of personality in these delicate, complex areas by using these methods which you ordinarily could not get from a simple questionnaire or simple interview.

As far as children are concerned, you have appropriate modifications of projections. You present children with dolls, or with toys, or with pictures that are appropriate to their age level, and you ask the child to play with the



## Kenneth Clark - Direct

doll, or to tell you about this picture, or to make a story, and this is the kind of method which my wife and I have used in our research on this problem. We have developed and used extensively a method of dolls, wherein we present to our children more dolls than are absolutely identical in every respect except skin color. These dolls came from the same mold, only they were treated differently in terms of the color that was placed upon their skin. We ask these children certain questions about these dolls. Now we ask them questions which help us to determine whether the child has any knowledge about the relationship between skin color, and white and colored, or Negro. Then we ask them questions such as, "Which doll do you like best? Which doll is a nice doll? Which doll is a nice color?" And the final question that we ask our children in this kind of research is, "Which doll is like you?" Well, on the face of it, this seems to be a kind of situation in which a child was just reacting to dolls. Actually, the results which we get are much more fundamental, more profound, in telling us not only how this child reacts to himself but how he reacts to himself in terms of the personal problem of the factor of race.

These are the methods and appropriate modifications of these methods are the methods which colleges have developed and have used for dealing with the complex, intricate problems



## Kenneth Clark - Direct

of personality in society, personality in race, personality in guilt, and other problems of this and that sort.

BY JUDGE HITCHESON:

Q Doctor, may I ask you a question? Did you ever vary the test by having one doll, say, scarlet, and the other one green?

A No. That has occurred to us, Your Honor. Many phases of this problem do require some details and specific information, and it has occurred to us, as a consequence of our observation of how the children react to still another method, a coloring method. We present them with a picture of a boy or a girl and we say to the child -- if it is a little boy, we point to the picture of the little boy and we say, "This is little Johnnie; this is you." Color him the way you are," and we sometimes find a very fascinating result.

Q What number of colors do you provide him with?

A We provide him with 24 colors from a box of Crayola crayons (we use that as standard) in which there are varieties of colors from white to black, and they are spread out randomly before the child. Before we do that, we ask him if he knows the relationship between objects and color. We ask him to color an apple, for example, we ask him to color a leaf, we ask him to color an orange, and a mouse, and only



## Kenneth Clark - Direct

after the child does those successfully, we say to him, "Now, color yourself." And your question reminds me of this kind of result: Sometimes we find that some children are so disturbed about the problem of their own skin color that they will take a bizarre, completely inappropriate color and color themselves -- a color like vermillion; sometimes they will just scribble it.

So, we wondered whether it could not be for future research to go into this whole question -- bizarre, or completely inappropriate skin colors of dolls -- to see whether or not this might not give us even more fascinating results on children's reactions to race as indicated by skin color.

Q You find some children, I presume, who are color-blind?

A I found one, in South Carolina. He did not know he was color-blind before this day, but he was completely color-blind.

BY MR. CARTER:

Q Dr. Clark, you have employed these methods in varying degrees, have you not?

A I have.

Q Personally?

A Personally.

Q As a result of employing them, have you been able



Kenneth Clark - Direct

to reach any conclusions which you consider valid on the effect of racial segregation on the personality of the individual Negro child, particularly?

A Yes, I have been able to reach a conclusion on the effects on the Negro child through the use of these methods.

Q Would you describe what conclusions you have reached?

A I have come to the conclusion that prejudice, discrimination, and segregation in general, each has a basic corroding and distorting effect upon the personality of the Negro child who is a victim of these. This is true of Negro children in general. It cannot be said to be true of any specific Negro child, but in our research we found that the majority of the Negro children gave evidence of a basic distortion of the personality related to race and racial status. Now the existence of this distortion is damage to their self-esteem, and I would like to illustrate this by an actual situation which arises among some of these children.

In asking the children about these dolls -- I will repeat the questions I ask them, because I think it is related to how they betray what happens to their concepts of themselves. The first thing that we want to know of each child is whether that child has a clear concept of the meaning of



## Kenneth Clark - Direct

white and the meaning of colored, you see, as these are socially defined, so we ask him, "Show me the white doll. Show me the Negro doll." Then we say to this child, -- we want to find out what his feeling about these dolls are -- so we ask the child, "Which one is a nice doll?" And the child picks one, which one he would like to play with, et cetera. Well, two-thirds or more of the Negro children only take the white doll and reject the brown doll (and these dolls are identical in every other respect except color), but they give spontaneous exclamations of why, and when you categorize these explanations, they are a reflector of the existing stereotypes about Negroes. These children, in their way, say, "Brown doll dirty. He is going to fight." Or, "He is bad," or things of that sort, and after getting these spontaneous expressions from these children which clearly indicate rejection of the brown doll by virtue of the brownness, I ask the final question: "Show me which one is like you." I report this always with a great deal of feeling of guilt, myself, because a great many of the children react as if I were the devil in hell, myself, when I ask this final question. Some of them break down and leave the testing station; they cry. Particularly is this true of children in the north. It is as if I had tricked them. We were all friendly before, they were expressing very freely

12-3



Kenneth Clark - Direct

their spontaneous reaction, and then I put them on the spot by asking them to make an identification. The explosion, or the emotional reaction, I as a psychologist, and my colleagues agree with me, interpret as the degree to which this method clinches or puts its finger upon the flagrant damage to the self-esteem, the self-respect of the Negro child.

The fascinating thing, the thing which we did not expect, was the getting of evidence that this damage began as early as it did. In my work with the American Youth Commission, I had already had evidence that there was the danger in adolescence. This was the first time we had evidence that it could begin as early as four or five and, the more sensitive and intelligent the child, the earlier it began. Not all Negroes react to this damage to their self-esteem in precisely the same way. A number of factors influence how the particular child would react -- the security he has in his home has been pointed out, particularly the social class to which he belongs; the educational level of his parents; the economic level of his parents. The one thing that all Negro children have in common, however, is that they react to this fundamental ego damage in some way.

BY JUDGE DOBIE:

Q May I ask you how you relate that to segregation, which is really our problem?



## Kenneth Clark - Direct

A Yes. An examination of the literature reflects, I think, quite clearly that segregation is the crystallization of prejudice. Segregation is prejudice concretized in the society, and in my work with Negro youth and in my interviewing them, I find that this is the way they interpret it: Segregation is a mist, like a wall, which society erects, of stone and steel -- psychological stone and steel -- constantly telling them that they are inferior and constantly telling them that they cannot escape prejudice. Prejudice is something inside people. Segregation is the objective expression of what these people have inside. I mean, I could be sitting beside a prejudiced person and his prejudice would not harm me until he starts expressing his prejudice by attempting to damage me, and I think that the relationship between prejudice and segregation is more clearly perceivable that way.

Q Did you ever conduct any experiments with white children in picking dolls? I have done some graduate work in psychology, but I am not an expert in that field, and I am certainly not in the field of dolls -- I will limit it now to a toy -- but I have known of cases where little white girls were desperately fond of little black dolls. Does that have psychological significance? You have heard of that, haven't you?



Kenneth Clark - Direct

A Yes, I have heard of that. In fact, I had a student at the college, a white girl, who wrote a biography on me in a course in child psychology, in which her memory was the memory that when she was about four years old she had a doll that was white-and-black. One side was white, and the dress came down and covered the black side, and when she turned it over the dress covered the white side, and she recalled that she liked the black side better, and she used to play with it all the time, and she played with it for a year or so, until an aunt came and thought this was wrong, and literally I took it away from her and told her she was a big girl now and had to get away from this. That was one of the most disturbing things that ever happened to her. And I have heard of other things of that sort.

12-4

BY MR. CARTER:

Q Dr. Clark, you have described injuries which you say occur as a result of segregation and discrimination. In what way is this segregation practised in the field of education -- in what way does it interfere, if at all, with the learning process that the child is subjected to?

A I think it does. In order to spell out as clearly as I can how it does, I will have to tell you the ways in which human beings react when their self-esteem is basically damaged, when they are forced to feel inferior by a society



## Kenneth Clark - Direct

which continuously tells them that they are inferior. As I started to say, some human beings may react by withdrawing, becoming submissive, seeking to avoid as many contacts with this punishing society as it is possible for them to avoid. Others may react aggressively, become rebellious, and try to fight back against the society that is trying to tell them they are almost substandard human beings. Sometimes it takes the form of anti-social activity -- aggressiveness -- and some social scientists believe this is one of the ways of explaining the high delinquency among youngsters and children of a minority group. Others may fight back, some constructively, by seeking to prove that they are not as inferior as people say. These seems to be in the minority. Others may react by hating themselves -- hating not only their persecutors but hating their fellow-victim, which is the concept of self-hatred which Dr. Cheim mentioned. Still others react by becoming excessively hypersensitive about racial matters. Practically everything becomes racial and they seem preoccupied with the racial problem.

I think, when you see these specific areas in which people react to fundamental damage to their self-esteem, you can then see how any situation which constantly reminds the person of his racial inferiority would be a situation in which he could not generally profit.



Kenneth Clark - Direct

Segregated schools is such a situation. It is a situation which is constantly burning into that person's mind the fact that he is supposed to be inferior. He has to waste time and energy and, whether he wants to or not, he naturally must expend time fighting against being told that he is inferior. The very preoccupation with race takes away time that could be more constructively used in the pursuit of the educational process.

It is for that reason that I would answer your question that a segregated school, or a segregated situation, interferes with the full development of a person.

Q You have described methods of determining the effect of prejudice and racial segregation on the individual. Let me ask you, have you employed any of these methods with respect to any of the minor plaintiffs involved in this case?

A Yes, I have.

Q What method have you employed?

A The interview method.

Q Will you just describe what you did and give us a summary of the questions asked and the conclusions that you reached. I think that would be the simpler way to do it.

A All right. I asked that at least ten of the plaintiffs be brought to a station where I could talk to them,



## Kenneth Clark - Direct

because I wanted to check them, myself, their personality, their motivation, and to see whether it checked with other material which I had.

BY JUDGE DOBIE:

Q Do I understand that this is ten of the pupils of the Moton High School?

A That is right. I wanted to talk with them. The purpose of this was because I wanted to see for myself how these youngsters saw the situation. I felt that a person's reaction to a situation was determined by how that person saw the situation, without regard to how the situation actually is, and for this reason I wanted to talk with them. I therefore interviewed fourteen of them yesterday, and I asked the following questions --

BY MR. CARTER:

Q How did you choose them?

A I asked that they not be chosen, as such, but whichever youngsters were available who were plaintiffs be made available to me in a private situation for an interview.

BY JUDGE DOBIE:

Q In other words, you did not choose children that were supposed to be especially neurotic, or especially hurt by racial prejudice, or anything like that?

A No.



Kenneth Clark - Direct

Q You just chose plaintiffs?

A I chose them at random.

I used the following questions and gave the children full opportunity to structure it any way they wanted to. I asked them their name and their age -- and I was interested that none of them asked me my name or my age. The first question I asked was, "Just tell me about your school." Now, in a normal educational situation a question like that could elicit a wide variety of responses. The results which were obtained from that question of the fourteen youngsters were as follows: --

12-5

JUDGE DOBIE: That certainly would be the truth if you were absolutely objective, because you know and I know that there are a great many different kinds of schools.

THE WITNESS: That is right.

This was the first question I asked the youngsters, after their name, age, and what-not: "Just tell me about your school."

In every single case, the question was responded to by something negative. For example, ten of the fourteen continuously said something which indicated inadequate heat. Eight of the fourteen spontaneously said, "It leaks." Eight of them spontaneously mentioned the completely inadequate



## Kenneth Clark - Direct

auditorium. Four of them mentioned the difficulties in going from building to building during cold weather. Two of them ascribed their colds to such difficulties and two of them ascribed sinus troubles to such difficulties.

end 12



L-1

Clark - Direct

BY JUDGE HUTCHESON:

Q Were these examinations after the so-called strike, or before?

A You are quite right, your Honor, and I think that is an important factor in explaining a number of things which emerged here.

The thing that seemed very significant to me, though, was that these children reacted to school as a symbol of the negative. It was to them a symbol of some stigma, as the subsequent results will indicate.

After giving them an opportunity, freely, to express their feeling--by the way, I want to qualify my first statement. There were three of the youngsters who said, spontaneously, after giving all of the negatives, they said, "But we have pretty good teachers." Three of them said that on their own hook.

The next question I asked them was--and I asked it in precisely this form: "What about the white school?" The significant results here, it would seem to me, is that there are two of significance--not one of these children seemed to have thought of the possibility that the white school could have something wrong with it. Not one negative



E-2

Clark - Direct

thing was said or even thought about the white school. I think this highlights what might very well be a very significant consequence of segregation. The setting up of barriers which lead to completely distorted concepts of reality, or may not be distorted but from the point of view of these children, to them the reality must have been that the white school was either all quite important or if there were any negatives, they had no way of knowing it; and that latter interpretation may be indicated by the fact that 9 of the 14 seemed surprised that I would even ask them about the white school.

They reacted by this: "I have never been inside of the white school." as if to say, "How do you expect me to know?" And some of them even seemed as if they thought it was a foolish question that I would be asking them, obviously Negro youngsters, to tell me something about the white school.

I had to press some of them to say, "I have never been inside." By the way, one youngster said he had been inside and he had been in the shop once, and he seemed a little proud of that. I had to press them: "I know you haven't been inside, but what have you heard about the white school?" And the majority of them even refused to tell me



L-3

Clark - Direct

anything that they had heard. 3 of them said, "Well, I heard people say that it is better." But most of them continued to say, "Well, I think it is better." One insisted, "I don't know anything about it and I haven't heard anything about it." as if to say, "Look, let's get on another subject. I don't want to dilly-dally too long on this."

The third question was the question which many of them would have thought was silly, and, again, it was deliberately formed to give the youngsters as much freedom to make their own answers as possible. I said to them: "Why is that?" Some of them did not understand what I mean when I said, "Why is that?" After they had given an indication that they really did not understand, I made it clearer to them; I said, "Why is the white school better?"

The significant response here, or the significant result here, as I see it, is that 8 of these youngsters, even when pushed, refused to make any statement about this, except saying, "I don't know"; "I don't know." One of them said, "Well, they are just better, that is all." Two said, "Because of segregation."

And then we have a long list of responses which overlap in some of them, such as, "The superintendent doesn't care about our school"--one child mentioned that.



Clark - Direct

One mentioned that he didn't think it was right that it be better. One ascribed it to the Negro people's inactivity. One said that the white school was better because the Negro people were too apathetic and they do not cooperate. Two of them mentioned that "they wanted to keep us inferior." One mentioned, somewhere along the line, that he thought that officials responsible for the schools thought that their present schools were good enough for Negroes.

A fourth question is the question: "What can be done about it?" These youngsters tended to answer this in terms of a flat statement which might not have any psychological meaning at all--a concrete statement: "We just need a new school." That is all. But in looking over the responses, what seemed to stand out, they seemed to feel if it is anything done about it, it would have to be done by the efforts of the Negro people themselves.

For example, when I asked them: "Do you think that things will improve? Do you think you will have a better school?" 4 of them said, "Yes, if we continue to try harder, if we continue to fight."

Your Honors, I think this reflects very clearly the events that occurred in that community as to the strike. 3 said, "Yes, if we cooperate and if we continue to stick



-5  
Clark - Direct

together," and said, "and let people know that we are serious." G pointed out, "If we continue to work with the NAACP, things will get better."

The total here is more than 14 because some youngsters mentioned two things. One, for example, said that "The whites will change and help us to get a new school if they see that we really mean it, that we want one." One pointed out, "if Negroes continue to fight harder." And one felt that hope was to be found in the enlightenment of his parents.

The last two questions I asked were questions which I framed to give me results, which would tell me something about how these youngsters saw themselves as part of, or independent of, the school fight, as such. And I just asked them two questions of this sort: "What do you think of white people?" That was the first question. The second question was: "What do you think of colored people."

The most frequent response to the question of "What do you think of white people?" was: "They want to keep us inferior." One youngster specified that by saying, "They want to continue to act toward us as if we were slaves."

Very closely related to that, from 3 youngsters, "They think they are better---"



BY JUDGE DOBIE:

Q Did any of them answer a question of that kind as to qualities of white people, without reference to their relationship to the colored?

A Two youngsters might fall in that category, your Honor, by saying, "Some are good and some are bad," "I suppose they are like other people," something of that sort. One youngster said---

Q A pretty safe generalization on the part of that youngster.

A Yes, sir. One youngster said, "As a whole, they are all right, I guess." He qualified it by "I guess." I interpreted it as being sort of an evasion, a desire not to commit himself.

One youngster gave a very interesting response: "Well, to tell you the truth, I can't put it into words." And I said to him, "What do you mean, you can't put it into words?" I thought maybe he was thinking something so tremendous or so disturbing, but in probing, I found that he really meant that this was an area which he had not been able to articulate or verbalize and there was no point in his trying to do so now because it would not come out right.

One youngster said, "Well, I think that the



L-7

Clark - Direct

white people now days are acting like their forefathers, and it seems as if it is very hard for them to change."

Here is an interesting response. He said, "I think they should be intelligent enough to know that they are treating us wrong."

Only one youngster brought in that moral approach to his concept of the whites.

In response to the question: "What do you think of colored people?" 5 of the youngsters mentioned what I interpret, but maybe wrongly so, as some kind of continuation of a negative or stereotyped kind of attitude. This is the highest number of children found in a particular item. They said, "Colored people don't cooperate, they don't stick together in a fight." I thought that was interesting in the light of the fact that these youngsters were part of a community movement. But it seemed as if they continued this feeling. This might have been balanced, however, by the fact that 4 youngsters said: "They could be as good as anybody else, if they get a chance." One said, "Too many gossips." Two said they are just as good as whites. Two pointed out that they are trying hard for an education. Three pointed out, "They seem all right to me."

BY JUDGE DOBIE:

Q None of them interpreted these in terms of an



L-8

Clark - Direct

individual Negro or individual white person they knew, did they?

A Certainly not in their responses to color, no. They tended to generalize. And of the 13 comments found in their responses, 6 of them were negative, or could be interpreted as negative.

BY MR. CARTER:

Q Dr. Clark, as a result of this examination, do you think you are in any position to draw any conclusions as to the effect of segregation received as to these 14 children?

A Yes, I can draw a conclusion which I think the results will support. I think that in my contact with these youngsters the most pronounced thing that I observed is an excessive--what seemed to be an excessive preoccupation with matters of race, racial struggle, and much of it could be explained as a consequence of the conflict that they have just been through. But I think we must also bear in mind that the conflict itself has to be explained. The strife, the kind of experiences which they have had, I believe, set up in these youngsters the kind of orientation, the kind of sight toward their school, toward their family, toward their society, toward people who look like themselves, toward people who look differently, so that the most salient thing,



L-9

Clark - Direct

the most important thing to them, the structure of practically everything they perceive, is racial. I think that these results, not only in themselves, but these results seen in the light of the total context of the literature, which deals with this problem, would seem to me to support the conclusion that probably the most detrimental consequence of segregation is the degree to which it obsesses everybody with race--white and Negro children and adults, churchmen and laymen; and I think these results, if there is any single conclusion I would draw from them, would be that conclusion.

BY JUDGE DOBIE:

Q Did these children know who you were, or your professional qualifications and the purposes for which you were examining them?

A I am surprise, your Honor, that no one of them asked me, and I did not feel that I should have told them. I do not know why they did not ask me.

Q So far as you know, the children did not know the role that you played, that you were an expert psychologist and the purposes for which you were asking them these questions?

A So far as I know, that is true, they did not know. What they discussed among themselves, I do not know. But I



Clark - Direct

am surprised they did not ask that.

MR. CARTER: We would like to break now, your Honor. We have to go to the airport. We would appreciate a break now because we have to go the airport and we only have about 39 minutes.

MR. MOORE: I have just one question I would like to ask Dr. Chein. It will not take but a moment.

-----



Kenneth Clark - Direct

Richmond, Virginia,

February 27, 1952.

Appearances as before noted.

(The Court met pursuant to adjournment.)

THE CLERK: Civil Action No. 1333. Are you gentlemen ready to proceed?

MR. MOORE: Yes, sir. We are ready for cross-examination of Dr. Clark.

MR. CARTER: I have not finished.

JUDGE DOBIE: You have not finished your examination-in-chief of Dr. Clark?

MR. CARTER: No, sir.

JUDGE DOBIE: All right.

---

DR. KENNETH CLARK, resumed the stand in behalf of the plaintiffs and testified further as follows:

FURTHER DIRECT EXAMINATION

BY MR. CARTER:

Q Dr. Clark, I would like to get your opinion, based upon your knowledge, on your direct experience with the problem, and I would like to have your opinion on a hypothetical question. Assume that in Farmville, Virginia, a



## Kenneth Clark - Direct

high school, the Moton High School, is set aside exclusively for Negro children, from which children from all other racial groups are excluded, and assume only the fact that this segregation is required by law, all other factors being equal, - in your opinion, would the Negro child receive educational opportunities and advantages equal to those available to the child of the other racial group?

A In my opinion, the Negro child, under those conditions, would not and could not obtain educational advantages equivalent to those received by children of the other racial group for the reasons which I have tried to point out in my previous testimony, because given the conditions which you described, given that kind of condition, which is concretization of prejudice, and given the Negro child interpreting this segregation as a badge of inferiority, as a stigma, given his knowledge that this segregation means that he is being rejected, the results are a fundamental damage to his self-respect, loss of self-esteem, and anxiety of his own personal worth. He becomes confused by -- What kind of human being is it? Is he not worthy of any more respect which the society gives? The school itself creates anxieties in this area of his personal worth. It results in deep-seated feelings of inferiority. It may cause some of these children to engage in patterns of with-



Kenneth Clark - Direct

drawal, evasion or avoidance, submissiveness; it may cause others, or even the same child, to be at times aggressive --

MR. MOORE: May it please Your Honors, this is repetition. He has gone over that in here.

JUDGE DOBIE: I think he went into this at least thirty times. Can't you abbreviate, Dr. Clark? I think you have made your point just as clear as crystal.

A (Continuing) Well, for those reasons, Mr. Carter, I think it would be impossible for the Negro child to obtain, under these burdens, equal educational opportunity.

This situation, of course, affects the white children, too, and I think --

MR. MOORE: May it please Your Honors, we have been all over that time after time on yesterday.

JUDGE DOBIE: I think you can abbreviate it, Dr. Clark. I think Mr. Moore is right. We have been in this with the witness, I think, at least thirty times, and I suggest that we do not go over it more than thirty-five times. You have given your reasons and you have given them very clearly and very crisply, and in no uncertain terms. I suggest that you just abbreviate this.

A (Continuing) I think that the fundamental effect of the segregation in schools and in the larger society on



Kenneth Clark - Direct

the white children is the confusion in moral values, a confusion that stems from the fact that they are being taught in the schools the brotherhood of man, they are being taught democracy --

MR. MOORE: I object, again, Your Honors. We have been over and over the same thing so many times.

JUDGE DOBIE: We will let him do it very briefly.

A (Continuing) All right. And I think that the evidence shows that a child who is being taught moral values in a situation which contradicts these moral values becomes confused and conflicted about the meaning, the significance of the values and would tend to react to this confusion either by cynicism or rejection of moral values, or a fundamental questioning of the integrity of the individuals who were attempting to teach them morality and immorality at the same time.

MR. CARTER: Your witness.



Clark - Cross

CROSS EXAMINATION

BY MR. MOORE:

Q Dr. Clark, I would first like to inquire as to several questions about yourself. Where were you born?

A I was born in the Panama Canal Zone.

Q You lived in the Panama Canal Zone until you were of what age?

A Until I was, I think, about 4; I am not sure.

Q And then where did you live?

A My parents brought me to New York City.

Q What was the occupation of your parents?

A My father works for the United Fruit Company Steamship Lines. He is superintendent of their offices in Panama.

Q And your mother.

A My mother is a dressmaker.

Q Now, you lived in New York the rest of your life?

A Yes, except for a year that I spent in the West Indies, the period in my life between 8 and 9.

Q In view of your reference to Panama, I must inquire, if you know -- you appear to be of rather light color -- what percentage, as near as you can tell us, are you white and what percentage some other?

A I haven't the slightest idea. What do you



Clark - Cross

mean by "percentage"?

Q I mean, are you half white, or half colored, or half Panamanian, or what?

A I still can't understand you.

Q You don't understand that question?

A No. My parents were not born in Panama. My mother and my father are from the West Indies. My father was born in Jamaica and so was my mother. They met in Panama and I was the result.

Q So you are, really, a West Indian?

A I was not born in the West Indies; I was born in the Panama Canal Zone.

Q But your father and mother were born in the West Indies?

A My father and mother were born in the West Indies; yes, sir.

Q At what age did you start to school in New York City?

A I suppose about 5 or 6.

Q Did you attend the public schools in New York until you went to college?

A I attended the public schools in New York until I went to college.

Q About what proportion of the students in the pub-



Clark - Cross

lic schools where you attended in New York -- I imagine until you were some 17 years of age --

A I was 16.

Q You were rather precocious, apparently. About what percentage of the students were white and what percentage colored in those elementary schools that you attended?

A In the elementary schools that I attended, I would say about 30 per cent, or 35 per cent of the students were colored. In the high school that I attended, I would say, maybe in a graduating class of about 250 or 300, there were about 10 colored.

Q What percentage of your teachers in those elementary schools are white and what percentage colored?

A I did not have a Negro teacher until I was in the 8th grade, 8th or 9th grade.

Q You never had a Negro teacher until you were in the 8th or 9th grade?

A I was very happy when I had one, but I did not have one until I was in the 8th or 9th grade.

Q Isn't it true that there are very few Negro teachers in the elementary and high schools in New York City?

A At the time I was in those grades that was



## Clark - Cross

true, but I don't think it is true now. There are very many now.

Q Can you give us an estimate of the percentage now?

A I have no idea of the percentage, but I have an impression that the number of Negro teachers has increased since I was in the elementary and high schools in New York City.

Q Do you know what percentage of the population of New York City is Negro?

A I would assume about 10 per cent.

Q You know there is nothing like 10 per cent of the Negro teachers in the elementary schools in New York.

A No, I do not.

Q Do you deny that?

A I can neither deny nor affirm it, because I really don't know in terms of percentage.

Q How old are you?

A I am 37.

Q Now, you attended college where?

A At Howard University in Washington, D. C.

Q Is that a wholly Negro college?

A Not wholly, no.

Q What proportion of Negroes attend Howard Uni-



Clark - Direct

versity?

A Students?

Q Yes.

A I would say about 99 per cent, except during the war.

Q It is just a rare specimen that is not colored, isn't it -- a rare person?

A When I was there that was true, yes.

Q You attended there how many years?

A All together, I was at Howard as a student for five years and I taught there for one year after.

Q Now, did you come out of Howard with any feeling of an inferior status because you attended Howard as compared with some other northern university, where you could have gone to school with white students?

A I came out of Howard University a quite different person than the person who went into Howard University. At Howard University was the first time in my life that I became aware of what it really meant to be a Negro in America. At Howard University was the first time I was screened out of a restaurant. It was at Howard University that I organized a group of my fellow students to go down to the Capitol of the United States of America, the Capitol Building, in order to see if we



Clark - Direct

could not get them to treat us like the loyal Americans which we felt we were, by just giving us food in the public restaurant there.

I must answer your question by saying that my going to Howard University, after spending all the first part of my life in New York City, was an education in race relations which will stay with me for the rest of my life.

Q You found that in the city of Washington the public school system was a completely segregated system, didn't you?

A Oh, Washington is quite a segregated place. In fact, I think that was part of my education.

Q Now, you did not answer specifically my question as to whether or not you came out of Howard University with any feeling of inferior status as compared with the feeling that you believe you would have had if you had attended Cornell University, or Harvard University, or some school where you could have gone to school with white students.

A I personally did not come out of Howard University with a personal feeling of inferiority. I came out of Howard University with a very intense feeling of race and with a very, I think, decided tendency to be disturbed about racial problems. I went to Howard University, trying



Clark - Direct

to be prepared to be a physician. I wanted to go into the premedical field and I was all ready to go to medical school, but the very experience of being in segregated Washington caused me to change my whole vocational aspirations, and I said, "I don't want to go into medicine; I want to go into a field that will give me some way and some knowledge and some skill to try to help human beings, and I think that is definitely related to the experience you ask about.

Q Isn't it true that Howard University is an outstanding spot in this country which makes a great feature about the undertaking to instill in the students deep consciousness on these race problems and instill in them a spirit of desiring to fight about it?

A I don't know whether that is intentional or not, but it seems to me that any sensitive student at Howard, with or without his teachers, if he is just able to look around him, and if he takes his books not as an end but as a beginning of the understanding of society, he has to come out with a deep consciousness of the fact that there are certain things in our society that could be made better.

Q A great point is made of racial relations at Howard University?

A I think you are right. A great point is neces-



Clark - Direct

sarily made of racial relations because of the nature of the university.

Q Why did you go to Howard rather than to some other northern school?

A A number of factors. When I graduated from high school I was 16 years old; I had spent all my life in New York City; I was in the throes of adolescent rebellion; I felt if I stayed another year in New York City, I just wouldn't go to school; it would have been cheaper for me to have gone to a school in New York City, but I just felt that I could not stay in New York City any longer.

Q What was the trouble? New York just couldn't contain you?

A No. I guess it is hard to explain an adolescent. I told my mother I just had to go to college. I felt I had to get away from New York.

Q It was just the adolescent rebellion against parental authority?

A I think so. I think, fundamentally, I wanted to be on my own and see how I could function on my own.

Q This matter of race had nothing to do with it, then?

A I don't think so.

Q How much of your lifetime have you ever spent



Clark - Direct

in Virginia, other than the six months that you mentioned in your direct examination, when, you said, you taught psychology down at Hampton Institute? Is that all?

A That is all, aside from trips to Richmond or other places on speaking engagements.

Q You came down to Richmond occasionally on speaking engagements?

A Or doing some kind of research and investigation.

Q Were those occasions when you were representing NAACP?

A No. I have never represented NAACP.

Q You don't consider you are here at the instance of the NAACP?

A I might say I am here offering my services and my skill to the NAACP, yes, as an expert, but I have never gone on speaking engagements for the NAACP.

Q How much time would you say in your whole life you have spent in Virginia, other than the six months that you were down at Hampton, teaching psychology to the students at Hampton?

A A total of six months or one week, or six months or two weeks -- I am not sure.

Q How much time have you spent in any southern State in all your lifetime, except for the few days when



Clark - Direct

you were down in South Carolina a few months ago, testifying in the Clarendon, South Carolina, case?

A I spent a total of six years in Washington, D. C., which I consider the South.



## Kenneth Clark - Cross

BY MR. MOORE:

Q How much time have you spent south of Washington in any southern state except the six months you spent at Hampton Institute and whatever were the few days you were down in Charleston in the trial of the Clarendon School case?

A I spent a total of about six to eight weeks in Hot Springs, Arkansas -- Pine Bluff, Arkansas.

Q What were you doing there?

A Research, and visiting my in-laws.

Q About what proportion of the students at Hampton were colored?

A All of them.

Q About what proportion of those students came from north of the Virginia line?

A I really don't know. I think that the majority of the students at Hampton -- just judging from the caliber of their performance in class and their speech, I thought the majority of students in Hampton were from the south, south of Virginia.

Q You thought they were?

A I thought so.

Q You would be very surprised to find that the majority of them were from the north?



A I would. I told you what I used as my basis for judgment: the speech, accent, or the way they function.

Q Have you really any definite opinion about it?

A No. No, I merely answered what you said.

Q You referred to a study which you said was directed by one Gunnar Myrdal, in which you participated. Would not you just elaborate on that a bit? When was that made and to what extent did you participate in it?

A The Carnegie Corporation wanted to make an objective study of race relations in America. They felt that this problem was one in which there was such a great deal of emotion, people were emotional for or against, that it was important, if they were going to get the objective facts, that they find a social scientist of world-wide reputation, who was not an American, to direct the study. So they imported from Sweden, I think it was around 1938 when they first brought him here, a Swedish economist and social scientist by the name of Gunnar Myrdal to direct this study. Dr. Myrdal personally, and with the help of a few of his trusted associates --

Q How many?

A How many what?

Q Trusted associates. They were all trusted; how many were associates?

A In the beginning, he chose his staff with the ad-



Kenneth Clark - Cross

vice of, I presume, two or three associates. As a result of that study, which continued for about two years, two or three years, and culminated in the book that is considered by all authorities and all students of sociology in this country the outstanding classic in American race relations, the book called, "The American Dilemma."

My responsibility on that study was to review all of the psychological material, dealing first with racial differences. On that, I worked very closely with Professor Otto Kleinberg, of Columbia University, and to read, review and summarize all of the material having to do with racial attitudes and reactions of individuals, as studied by the psychologists as to race. I worked on that project for between 18 months and two years.

Q What I am trying to get at is did you write any of the book?

A No. I summarized all of the material dealing with the section I just told you, and Professor Kleinberg wrote the portion that was published, not in "The American Dilemma," because that study was so extensive there were a number of different volumes. There was a book called, "The Characteristics of the American Negro."

Q That is another set of books?

A No; it is part of the same series, but the public



## Kenneth Clark - Cross

only knows "The American Dilemma"; they do not know the other volumes which were part of the study and which were the source of materials from which "The American Dilemma" was written.

Q What I am trying to get at is very simple, really. To what extent did you write a single word that is in the book?

A Oh, the characteristics of the American Negro, that is where my material appeared.

Q I am not talking about material; I am talking about the words on the printed page --

A Of "The American Dilemma"?

Q Yes.

A No, I did not write that. That was written by Myrdal and his associates on the basis of the material gathered by the staff.

Q You referred also to some work you had done for the American Jewish Congress which, I believe, Mr. Cheim also works for?

A Yes; I was there before Dr. Cheim.

Q Were you there before him?

A Yes, sir.

Q That was just some general research work, as I understand it?



## Kenneth Clark - Cross

A Yes.

Q Who called this Mid-Century White House Conference for Children and Youth, that you referred to that you had collected some material for?

3-2

A The President of the United States.

Q Do you know who else was sponsoring that?

A It was under the specific sponsorship of the Federal Security Agency and the Children's Bureau of the Federal Security Agency.

Q May we pass on from those matters and come to another subject. You referred to several methods you had some familiarity with in testing these reactions on children from separation in schools, and so forth. You mentioned the interview method, the questionnaire method, which you called the pencil-and-paper method --

A Testing.

Q -- and the projected method. In the South Carolina case, you presented evidence relating to your doll method, did you not?

A Yes, sir.

Q Why did you not present evidence here specifically relating to Prince Edward County children by use of the doll method?

A Because the children with whom I had contact here



Kenneth Clark - Cross

older children. The doll method has been found to be useful and sensitive almost exclusively for the use of children between the ages of four and eight. We have not had enough material -- we have not tested enough children above that age to use that method with confidence. Remember, I said we use the method that seems appropriate to the age of the child.

I personally feel that we should do some work with the dolls on older children, and I started to do some not so long ago. But I did not feel confident in using that method with children of these ages.

Q You did not use the interview method, for instance, in the Clarendon County case?

A Oh, yes, I did.

Q You did?

A Yes.

Q You used a combination of the two?

A I used the interview method with the older children in South Carolina and the doll method exclusively with the younger children in South Carolina.

Q Have you ever been in Prince Edward County, Virginia?

A No, I have not.

BY JUDGE DOBIE:



## Kenneth Clark - Cross

Q Where did you examine these children?

A In Richmond.

MR. MOORE: I was coming right to that, Your Honor. I am going into all of that detail right now.

BY MR. MOORE:

Q I understood from your testimony, yesterday, that you had 14 of these plaintiffs, and there are about 100 plaintiffs, I believe, included in this case out of some 463 students in the high school?

A Yes.

Q Were all of those that you interviewed high school students?

A All of them high school students at Robert R. Moton High School.

Q Who brought those children over to Richmond? You said you interviewed them day before yesterday?

A That is right.

Q That was Monday of this week?

A Yes, sir.

Q The first day of this court trial?

A Right.

Q Right in the midst of the trial?

A No, it was not in the midst of this trial.

Q When was it?



## Kenneth Clark - Cross

A It was Monday morning, around -- I used from about eight-thirty to twelve-thirty.

Q You did not attend the trial in the morning session?

A No.

Q From about eight-thirty to twelve-thirty, about four hours?

A Four to five hours, I would say.

Q Where were the interviews had?

A The interviews were held in the library of the firm of --

Q Mr. Hill's firm?

A Hill, Martin and Robinson.

Q Who brought the children over?

A Mr. -- I don't know whether he brought them over, but he was the person whom I told I would like to see these children, Mr. Banks.

Q Who is Mr. Banks?

A Mr. Banks is the executive director of the NAACP for the State of Virginia, I think.

Q Yes, he is executive director of the NAACP for the State of Virginia. You understood that he brought them over from Farmville and Prince Edward County?

A I do not understand that he brought them over; I



## Kenneth Clark - Cross

think it would be more accurate to say that he arranged for them to be here.

Q Do you know whether he brought them over or not?

A No, I don't know that he brought them over.

Q Do you know what he said to the children before you saw them?

A No. I told him -- I told him, Sunday -- in fact, there was some question whether I could go out to Farmville with him Sunday, but it seemed as if it would be more convenient if they were to come here. I told him, Sunday, that I would like a representative sample. By "representative," I mean some of the children of the Moton High School who were among the plaintiffs.

He said, "How many do you want to see?"

I said, "Well, I would like to see between 10 and 15. Could you arrange that?"

And he said, "Yes, I think I can, because many of them are coming in."

I said, "Well, don't choose these in any special way, just have 10 or 15 of these youngsters, boys and girls," -- I think I said that.

Q He did the choosing?

A I told him not to choose them but to just find out if it were possible for me to have them.



cyl 3

Kenneth Clark - Cross

Q There were 463, or let's say, roughly, 450, and 10 were brought over; that is about three per cent. Do you know whether the school principal had anything to do with who should be sent over?

A I don't think so.

Q Do you know?

A If that is true, then somebody did not obey my instructions.

Q You do not know what was said in all of that ride from Farmville over to Richmond; that is about a two-hour ride, is it not?

A I don't know that Mr. Banks was with them on that ride, you see.

Q Somebody was with them on that ride. You do not know what was discussed on the ride, do you?

A I certainly do not, because I do not know of any of the circumstances about their transportation from Farmville to Richmond, you see. I was just concerned with the fact that they would be in Richmond.

Q How many boys and how many girls were in this 14?

A I can give you the exact figures.

Q Will you get them?

A Sure.

Q Let us just get the names and ages and whether they



Kenneth Clark - Cross

are boys or girls.

JUDGE DOBIE: Do you think the names are necessary?

MR. MOORE: Well, that is all right. Just the ages and whether they are boys or girls.

BY MR. MOORE:

Q (Continuing) All of them were plaintiffs in this case?

A I presume so. In fact, I asked for plaintiffs.

Q Yes, that is right. A plaintiff means a fellow who is complaining?

A Yes, sir.

Q All right, just give us the information I requested.

A Five boys.

Q Five boys?

A Five boys and five girls.

Q Let us get the ages.

A The ages of the boys ---

Q If you have the grades, that would help.

A I have the grades, too. Boy 1, age 18, 11th grade.

Boy 2, age 17, 11th grade.

Boy 3, age 19, 12th grade.

Boy 4, age 18, 12th grade.

nd t 3

I am sorry, there were four boys.



## Clark - Cross

Q Now, let us get the girls and their ages and grades.

A	NUMBER	AGE	GRADE
	1	15	11th
	2	17	11th
	3	15½	10th
	4	17	10th
	5	17	11th
	6	15	10th
	7	15	11th
	8	17	12th
	9	13	9th
	10	18	12th

Q So, there were 10 girls and 4 boys.

Now, it is pretty clear after you have read your list of these ages why you did not use the doll test, isn't it?

A Yes. That is what I told you.

BY JUDGE DOBIE:

Q Dr. Clark, I think I might shorten this a little bit by just asking you one short question. You had nothing to do with selecting the particular children?

A Nothing at all.

Q Or as to the coaching of them, or the directions



Clark - Cross

as to what they were to say or do before they were brought to you?

A That is right. In fact, I made it clear that they were not to be selected for any particular reason.

BY MR. MOORE:

Q You didn't come along with them and you have no idea what they were told on the way?

A I certainly did not, but if they were told anything on the way, that would be a very serious breach of my desires.

Q I will just ask you, on what I will call a sort of man-to-man basis, can you imagine a subject that was more discussed in the families of those 14 children during the last recent months than that strike or this law suit?

A I will certainly answer you, on a man-to-man basis, I cannot.

Q That was probably the hot subject of discussion at every breakfast table and every supper table.

A There is no question about that. I think you are quite right.

Q They had heard day by day of the alleged differences in the two schools, hadn't they? Don't you realize that is so?



Clark - Cross

A Oh, surely. I would concede to you that this is something which these children apparently had been discussing over and over and over again. As I used the word yesterday, they were obsessed with it.

Q If you start out and try to find a mouse, you probably can find it, can't you?

A You certainly can.

BY JUDGE HUTCHESON:

Q Dr. Clark, did you ever conduct a similar study among white high school children?

A No, I have not conducted a study similar to this among white high school children. I have conducted studies of racial attitudes and the pattern of racial feelings among white college students, but not white high school students.

BY MR. MOORE:

Q Let me ask you a question in connection with Judge Hutcheson's question. Weren't you asked in the South Carolina case whether or not there had been any study on your doll test among the white students, and didn't you say that one student had made such a study but that you did not really have the information available from that test?

A That is quite true.



Clark - Cross

Q Have you gotten that information since then?

A No. In fact, I am very disturbed about that, because my wife and I made available to this student, who was getting her Masters at Columbia University, all of our materials for the specific purpose of using our methods on white students. As far as I know, she did the study -- she had the facilities available for doing the study -- but we have not gotten the results, and this is one of many students whom we have helped, or tried to help, without getting reports of what happened.

Q Isn't it true that you have made these so-called tests, or whatever we may describe them to be, in different parts of the country? For instance, in Springfield, Massachusetts, and in Georgia?

A I don't believe in Georgia, but in Arkansas.

Q Didn't you testify in the South Carolina case that you had made tests like this in Georgia?

A I don't remember -- in a number of different parts of the country.

Q Anyway, that is not so important. Isn't it true that you found the same reaction of colored children in the New England area in response to your doll tests that you did in South Carolina and these other places?

A It is true that I found similar reactions among



Clark - Cross

the children in New England that I found among the children in the South -- in South Carolina. It is not true that I found the same reactions.

Q Did you not admit on one occasion in your testimony that the reactions among certain of the northern children were more acute in New York than they were in other parts of the country?

A More acute in terms of overt expressions of emotions among the children in New England than among the children in the deep South -- you are quite right. As I pointed out yesterday, some children sort of had an emotional explosion and left the room in tears. Not one of these children was from the South; these were children in the North.

BY JUDGE HUTCHESON:

Q Is it a fact -- or can you answer this question -- that there is usually among adolescent pupils in either a public school or a preparatory school, a tendency to complain of school conditions generally? Are you prepared to say whether that is true

A Your Honor, I am not prepared to make any definite answer to that, no, under conditions where I could have held the race factor constant. I have never studied students' reactions to their school independent



Clark - Cross

of the factor of race. I think, to be competent to answer that question, I would have to have comparable data from adolescents in a situation in which race is not particularly pertinent.

Q Have you ever seen a boy in a boarding school who was satisfied with the food?

A No. You are quite right.

BY MR. MOORE:

Q Doctor, did you interview these 14 students -- I started to call them children; they don't seem to be children in many instances -- one by one?

A One by one, alone.

Q That means you had, let us say, four hours. You had about a 15-minute interval with each one?

A I will say a 15- or 20-minute interval.

Q Were these questions that you listed yesterday all the questions that you presented to these students?

A There were two questions which were a repetition of two which I asked before, and I wanted to check on them, because they seemed to be -- necessarily, as a common interview practice, you ask in the beginning of the interview certain questions -- I presume lawyers use the same kind of technique.

Q Well, we vary all along the line.



Clark - Cross

A Yes, sir. You try to pull the information -- you ask the question in a slightly varied form and see if you get similar information. That is sort of checking on the validity of your first information.

I will read you the whole list, so that you will see they are exactly the same. I read you all the way down through, "What do you think of colored people?" Do you remember I read two questions -- "What can be done about it?"

Q Yes.

A And, "Do you think things will get better?"

Q Yes.

A Those were the two questions that I read at the end -- what to do to make things better -- what do you think will be done to make things better. That is the same as the other. And, "Do you think that this will get better?"

Q As I recall it, you had only six questions.

A Well, as I said -- let me see --

Q We will just play like I am one of these 18-year-olds. Now, you just put on the interview like you did it.

JUDGE DOBIE: "Make me a child again."

MR. MOORE: I would like to be a child again.



## Clark - Cross

DR. CLARK: "Your name, please."

MR. MOORE: "Justin Moore."

DR. CLARK: "How old are you, Justin?"

MR. MOORE: "I will play like I am 18."

DR. CLARK: "What grade are you in?"

MR. MOORE: "I will be in the 10th grade." I  
have been a little slow.

DR. CLARK: "What school do you go to?"

MR. MOORE: "I go to the Moton School."

DR. CLARK: "What does your mother do?"

MR. MOORE: "She works: she works on the farm,  
and works every day."

DR. CLARK: "What does your father do?"

MR. MOORE: "He works on the farm, too."

DR. CLARK: "I would just like to ask you some  
questions. Tell me about your school."

MR. MOORE: "Well, it is not much good."

DR. CLARK: "Will you tell me about it?"

MR. MOORE: "Well, we don't have all the things  
that they have got over at the other school. That is what  
my parents say."

DR. CLARK: I don't remember one of them saying  
that, by the way. Not one of them volunteered information.

MR. MOORE: I just want to see how you put on



## Clark - Cross

the test.

DR. CLARK: "What about the white school?"

MR. MOORE: "I hear at home that it is fine. I have never been over there.

DR. CLARK: "You hear that it is fine?"

MR. MOORE: "Yes, that is what I hear.

DR. CLARK: "Why is that?"

MR. MOORE: "Well, they have got more money, I suppose, for it."

DR. CLARK: "Who has more money?"

MR. MOORE: "The School Board."

DR. CLARK: "Well, what do you think can be done about it?"

MR. MOORE: "Well, I think we may get a better school if we keep on fighting about it."

DR. CLARK: "Do you think that things will get better?"

MR. MOORE: "Oh, yes, I think they are going to get better if we keep NAACP working for us."

DR. CLARK: "Tell, what do you think of white people?"

MR. MOORE: "Oh, some of them good, some of them bad. I think that is about the way most of my friends feel about it."



Clark - Cross

DR. CLARK: "What do you think of colored people?"

MR. MOORE: "Oh, the same way -- some of them good, some bad."

DR. CLARK: "What do you think we can do to make things better?"

MR. MOORE: "Well, just work harder."

DR. CLARK: "Do you think it will get better eventually?"

MR. MOORE: "Oh, yes, I think it is getting better all the time."

DR. CLARK: That was the briefest interview we have ever had.

JUDGE DOBIE: Dr. Clark, I hope it won't embarrass you by asking you to give Mr. Moore an I.Q. rating.

BY MR. MOORE:

Q Doctor, you did not tell them who you were?

A I did not tell them who I was, and I was really amazed that not one of those youngsters asked. That seemed to me quite strange. They were high school youngsters; they must have known that I had some role, or some interest; but not one of those youngsters said to me, "Well,



Clark - Cross

what is your name?" Or, "Who are you?" Or, "What is this?"

Q Did it ever occur to you that the reason for that was that somebody had explained to them what they were coming in for and whom they were going to see?

A Mr. Moore, If I had engaged in any such discussion with these youngsters, it would not have been to the advantage of the interview and the purposes I had in mind. If they had raised it, I would have put it as part of my findings, but they did not raise it, and I could not initiate it myself and follow the proper use of this method.

Q Do you seriously contend that a little 3-minute interview like we have had, or if you stretch it out to five minutes, really means anything, carried out on the basis that you have indicated, where a 17-, 18-, or 19-year-old student, who has had this subject discussed day in and day out for nearly a year -- do you really seriously contend that that means anything except that they wanted to complain about their school and they wanted to get another school?

A Mr. Moore, I don't believe that the results of this interview are of any world-shaking importance. I don't believe that these results can give us any information of any value independent of these specific 14 young-



Clark - Cross

sters. The only value that these results can have -- they are two-fold: First, they tell us something about these 14 youngsters and the degree to which we can see what we see about these 14 youngsters in the context of a lot of other things that we know are relevant about a lot of other youngsters, and the degree that we can see what we see in these youngsters in many others reflects and is comparable to what we see in hundreds of other youngsters, using other methods, seeing them and talking to them in other situations. Those are the only conditions under which I offer these materials to the Court.

Q As a matter of fact, does not your whole opinion in relation to that interview of those 14 boys and girls simply come down to a matter of an inference or an opinion that you, yourself, draw, with no more to go on than what you have described?

A No, I would not say that at all.

Q Well, isn't that a fact, though?

A No, it is not a fact. As a matter of fact, what I see about these 14 youngsters is very real about these 14 youngsters. You are right, and everyone else would be right in saying that there are certain conditions that make these results what they are, but they are not just inferences.



Clark - Cross

If you would care, I would like to read you the responses of one of these youngsters and you could see that it could not possibly be interpreted as my inference. I wanted to make the comment, that as the morning wore on, I wished that there were some youngsters as brief as you were in the interview, but they were not.

Q Did you get out of that interview any suggestion from a single one of the 14 that what they wanted was to go over and attend school with the white students? You did not indicate that, and I would like to know if you got any suggestions of that sort?

A I think there were only two youngsters who verbalized that the solution to their problem was attendance at the white school. But, Mr. Moore, you have to see that result in the light of a very interesting result from these 14 -- the shock, the surprise, and in some cases it even seemed to me like it could be interpreted as horror, when I asked them the simple question, "What about the white school?" Now, this is my interpretation, and I will so label it: that one of the things that segregation does to the Negro youngster, particularly Negro youngsters in the South, who have in their society so many barriers, so many aspects of segregation, is to make them almost unable to conceive of a non-segregated situation. I found this in



Clark - Cross

4

South Carolina, I found this in Arkansas, I found it wherever I tested Negro children in the South -- that the pattern of reaction of southern Negro youngsters to segregation is to accept segregation as if it were normal. They learn this as if -- well, it is like breathing oxygen -- that you don't think in terms of the white school, you don't think in terms of having the same things which whites have. They are rigorously conditioned in some cases not even to compare themselves with the whites.

Q Didn't you get out of these interviews that what these children wanted -- or adults; most of them are adults, apparently -- was a new Negro high school?

A Yes. I told you that, and I told you why I thought this was all they could think of wanting.

Q That is your idea about what they wanted.

A I said it was my interpretation as indicated by the fact that when I said to them, "What about the high school?" They reacted as if this were the last possible thing that they could conceive of.

Q Now, will you tell the Court any results that you were able to identify with respect to those 14 adolescent boys and girls which was attributable to the mere fact that they had attended a segregated school, which by law was segregated? Now, just keep your mind on the fact that it



Clark - Cross

was a segregated school by law as distinguished from a school that might have been segregated voluntarily.

A Well, I think, Mr. Moore, that one very obvious, simple, concrete result that reflected that fact was the absolute and complete negation of their school.

Q They just thought they had a bad school.

A Not one of them mentioned even a single positive thing about their school. The fact that these youngsters -- and this is not an inference; I think it comes out of the results -- to these 14 youngsters the school was a symbol of stigma, the school was a symbol of inferiority; when they thought of school they thought of deficiencies.

Q Deficient school.

A They thought of race when they thought of school. I think this is important: These youngsters could not have a common constructive, growing, democratic experience; they thought only of race and racial rejection.

Q How do you account for the fact that in connection with your doll tests in those sections of the country where there is no segregation by law, that you got the same kind of reaction that you do in places where segregation is provided by law, as in South Carolina?-- That is the only place you seem to have tested it in the South.

A That is not true; I tested it in Arkansas.



Clark - Cross

Q Well, you got a similar reaction. How do you account for the fact that you got the same or similar reactions in the North, where no segregation exists by law, as you did where it does exist by law?

A I think that the reaction of children is never to just one aspect of their society. These children appeared to be sensitive to all aspects of their society. I think it was pointed out that there is segregation in parts of the country in which there is no legal, or legally-enforced, segregation. The child responds to the fact of segregation. He responds to the treatment of the Negro in our mass media -- in our newspapers, on the radio -- the dialect and menial role which is generally ascribed to Negroes -- and, I presume, television. There are a myriad of factors in a society, North or South, which influence children's reactions. School, though, is a very important one of those many factors which influence those children.



Kenneth Clark -- Cross

BY MR. MOORE:

Q Are you familiar with the fact that one of the primary purposes of the NAACP, as it has been announced repeatedly by their representatives, as reported in the press, has been to stir up and foment critical situations that will call attention to this racial problem?

A I am not --

MR. HILL: Just a moment. If counsel is going to ask a question, I think he should ask it accurately, and I challenge Mr. Moore to state any place where NAACP has been reported as being its policy to foment anything. We unquestionably are trying to break up segregation, and everybody will admit that. But if he is going to ask the question, let him ask it fairly.

MR. MOORE: You, yourself, were reported in the Richmond Press, just after the Mosque case, in connection with the Mosque case, as urging the people in Richmond to create these situations that focus attention on differences in race treatment, and you knew you were.

MR. HILL: I dispute that, and I dispute the fact that even the press reported any such thing. I did say, and I say it now, that I urged people to exert themselves to carry on their rights, whatever their



Kenneth Clark -- Cross

rights were, under the law; they should press for them. And, going to the Mosque, being segregated, is a denial of their rights, and they ought to go there and not be segregated, and refuse to be segregated, and I say it here.

MR. MOORE: And you have repeatedly, and the press has reported it, urged the Negroes in Richmond to try to create a situation in the public transportation and to tie up all of the policemen they can, and all the transit operators. You know that is a fact.

BY MR. MOORE:

Q I ask you, as a matter of fact, do you not know that is one of the policies of the NAACP?

A I certainly do not.

Q Do you deny that?

A I deny it on the basis of my knowledge.

Q You do not know of that?

JUDGE DOBIE: I think that is as far as you can go.

MR. MOORE: Just one or two more questions and I have finished.

BY MR. MOORE:

Q I would be interested to know what is your opinion as to why a very substantial number of the students at Hampton Institute, where you say you taught, come there from



## Kenneth Clark - Cross

nonsegregated states, rather than to go to institutions where there are other kinds of institutions?

A I am not competent to answer that question. I do not know the facts.

BY JUDGE DOBIE:

Q You think there are a variety of motives and you think you could not give a just generalization; is that not correct?

A That is correct. I do not even know what the proportion of the students at Hampton are, that come from segregated or nonsegregated states.

MR. MOORE: Just one more question.

BY MR. MOORE:

Q If I understand your position, you contend that in Prince Edward County, where you have never favored us with a visit, that even if a school is built there, as the evidence has indicated, which will be a better high school in building and equipment than any school region, just as good as any high school in Virginia, if you assume that the teachers have Ph D degrees in Education -- everyone of them, and they have taught for 20 years; and if you assume that they are paid salaries in excess of any high school teacher in Virginia; that they have brand-new buses to ride to school every day in; they have curricula better than any



Kenneth Clark - Cross

high school in the state of Virginia, - you insist that the Negro child in Prince Edward County, which you know about only from those 14 you interviewed, cannot get, in the state of Virginia, equal advantages and opportunities as the white child?

A I insist that, Mr. Moore. And I insist it most sincerely, because I do not believe material things are as important as your question would suggest that they are.

And I go further. I would say, give them all of these material superiorities which you describe in your question, and given that as part of the education of the Negro child, in a segregated situation, these very material things which you now describe as signs of superiority will, themselves, become tainted with stigma; they, themselves, will become the badge of personal inferiority. Material things have no value in themselves.

5-2 Q You notice I did not limit the question to physical things, tangible things, as you described it. I referred to curriculum. You may put as much spiritual background in it as you choose, and educational background, and everything else, except that you will retain the fact of separation.

A Let me give you an illustration of my point. The Jewish people in America have found themselves, in many areas in America, rejected and stigmatized, and many times



## Kenneth Clark - Cross

they have tried to fight against this rejection by building material demonstrations of value. And the more they attempt to build the material demonstrations of worth and value, the more those very material things become the basis upon which they are further stigmatized and they become the basis of stereotypes. So I will have to answer your question that no amount of that kind of material attempt at equality can ever substitute for the kind of essential dignity, acceptance, and humanity, which every human being, without regard to his color, his religion, or nationality background, must feel, if he is going to be a fully mature and fully adult human being. You cannot buy it with bricks and mortar.

Q You would agree with me that the Jewish people, through all of these 2,000 years, although they have suffered hardships at times, as they did in Germany, yet have maintained a great pride of race; do you not agree with that?

A I think, on some levels, you are quite right,-- the Jewish people have been forced to maintain a terrific cohesion and pride of race, but that is not without inconsistencies, not without contradiction, and, to use psychological jargon, not ambivalent. The fact that a person has to go around, being overtly proud, shows that he probably, deep down, does not know that he is quite that proud.

Q There has been very little mixture of Jewish race



## Kenneth Clark - Cross

with other races?

A I do not feel competent to answer that.

Q Do you not agree that the Japanese, who consider themselves the Sons of Heaven, have a very good pride of race?

A I don't consider that a healthy pride of race at all.

Q It is a pride of race just the same?

A It is a kind of pride of race which seems to me not to be consistent with a stable sense of reality or stable society.

Q Do you not agree --

A I do not agree the pride of race is of value.

Q Do you not agree that the Chinaman and the Indian have, in their own way, pride of race?

A When you put the question, "in their own way," I suppose I have to agree, -- "in their own way."

Q I ask you why do you contend that if the Negro in Virginia is given equal facilities and equipment and all of these other things that I have described to go along with it, why can't the Negro have pride of race? Why does he want, I suggest, to be in the category of what I believe someone has described as a "suntanned white man"?

A I do not think that is the desire.



Q Why can't he have pride in his own race?

A I don't think it is the desire of a Negro to be a "suntanned white man." I think it is the desire of a Negro to be a human being and to be treated as a human being without regard to skin color. He can only have pride in race and a healthy and mature pride in race when his own government does not constantly and continuously tell him, "Have no pride in race," by constantly segregating him, constantly relegating him, to a second-class status.

Q Let us get right down to brass tacks, in Virginia. Which do you consider would best promote his pride in race in a state as Virginia, where he is a minority group of 20 to 22 per cent, for him to have school facilities that are as good as the whites have, with his own people doing the teaching in the school, directing in the school; where he has his opportunity for his own development in his own way and his own group, - which would develop pride of race better; that situation, or to put him in a situation where the great majority of the people resented his presence and did everything they could within the law to let him know that they resented it?

A So far as I can see, there is no evidence that the first situation which you describe has led to any development of pride of race, as such, among the masses of



Kenneth Clark - Cross

Negro people. It has been interpreted as rejection. It has been interpreted as stigma. It has been used as an indication of a badge of inferiority.

Q I ask you this final question: Do you, or not, from your studies, and social science, as you have described it, believe that so far as the welfare of the Negro in Virginia and in the South is concerned, as well as the white man, that that would be best promoted, not by some effort to get a court decree, but by a gradual process of trying to bring the popular view around to that being the best thing to do?

A I think, that in order to answer your question, I need to have a number of things defined. A gradual process seems to me to be the essence of what you said. As a social scientist, obviously, I believe that people should be educated. I believe that people will be educated and can be educated by many different things. One of the most concrete ways of educating people, I think, would be for the Government to assume its responsibilities of protecting the rights of all citizens. And I agree with you that when the Government seriously, honestly, and with integrity protect the rights of every citizen, without regard to the color of that citizen, or the race of that citizen, or creed, that that, in itself, will be a significant educational experience



Kenneth Clark - Cross

for the masses of people and will start them on the road to understanding that in a democracy this is the way human beings must and have to behave.

Q How can you seriously make that contention, when there are only 17 of the 48 states that have this separation by law, and you admit, as you are obliged to do, that in the remaining states the same sort of conditions exist as to race consciousness and discriminations in other places?

A Mr. Moore, I did not say "the same sort of conditions."

JUDGE DOBIE: You said, "similar."

THE WITNESS: That is right. And I think there is a very significant distinction.

BY MR. MOORE:

Q Are not the worst conditions in this country existing in places like New York and Chicago and Michigan, where there is no lawful separation; aren't they about some of the worst places in this country?

A I just could not say that. I would not say "worst" conditions in the United States exist in New York, Chicago, and Detroit.

MR. MOORE: Thank you, sir.

JUDGE DOBIE: Anything further?

MR. CARTER: I want to ask him one question.



## Kenneth Clark - Redirect

## REDIRECT EXAMINATION

BY MR. CARTER:

Q Did anyone, other than you, know what questions you were going to put to those 14 children?

A Absolutely not. In fact, it was important that no one knew it.

Q Were you given any indication by the answers or the attitude of the children that they were coached and told what to do about the answers any way?

A No; there was no evidence of coaching. There was among some of the children evidence of a little shyness in the beginning, but as we went on, they got over it.

MR. CARTER: That is all.

JUDGE DOBIE: All right, Dr. Clark.

MR. ROBINSON: If the Court please, the plaintiffs rest, sir.

MR. MOORE: We are ready.